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13 UNITED STATES DISTRICT COURT

14 DISTRICT OF ARIZONA

15 In Re Bard IVC Filters Products  
16 Liability Litigation

No. MD-15-02641-PHX-DGC

**MOTION TO FILE UNDER SEAL**

**(Filed *Ex Parte*)**

19 Plaintiffs' Co-Lead Counsel and Liaison Counsel to the Common Benefit Fee and  
20 Cost Committee and the Co-Chairs of the Common Benefit Fee and Cost Committee  
21 respectfully move this Court, pursuant to Federal Rule of Civil Procedure 26(c)(1)(G) and  
22 Local Civil Rule 5.6 for leave to file under seal Exhibits A to Plaintiffs' Notice of  
23 Errata ("Exhibit").

24 The Exhibit contains confidential financial information relating to all Participating  
25 Counsel as defined in Case Management Order No. 6 (Doc. 372). Furthermore, as the  
26 Court is undoubtedly aware, all filings related to the Common Benefit Fee and Cost  
27 Committee have been filed under seal in this litigation. Accordingly, good cause exists  
28 for sealing the Exhibit.

1 RESPECTFULLY SUBMITTED this 11<sup>th</sup> day of March 2021.

2 BEUS GILBERT MCGRODER PLLC

3 By: /s/ Mark S. O'Connor

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 11<sup>th</sup> day of March 2021, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Jessica Gallentine